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December 28, 2018

VIA ECF

Honorable Freda L. Wolfson, U.S.D.J.
United States District Court
Clarkson S. Fisher Building & US Courthouse
402 East State Street
Trenton, NJ 08608

Re: *In re: Johnson & Johnson Talcum Powder Products Marketing, Sales Practices and Products Liability Litigation*

MDL No. 2738 – Duplicate Filed Cases

*McKoy, Noel, Personal Representative of the Estate of Moya M. McKoy (3:17-cv-11982);
McKoy, Noel, Sr., Individually and as Representative of the Estate of Moya McKoy (3:17-cv-12089); and
Clifton, Earl, Individually and as Personal Representative of the Estate of Moya McKoy (3:17-cv-11837)*

Dear Judge Wolfson:

I am writing regarding the duplicate lawsuits on file arising from the death of Ms. Moya McKoy. My law firm represents plaintiff Mr. Earl Clifton in case no. 3:17-cv-11837; Michael Goetz of Morgan & Morgan P.C. represents plaintiff Mr. Noel McKoy in case no. 3:17-cv-11982; and Stephanie L. Rados of Onder, Shelton, O'Leary & Peterson, LLC represents plaintiff Mr. Noel McKoy in case no. 3:17-cv-12089.

The Court previously granted our request for an extension until December 28, 2018. However, counsel for the respective plaintiffs learned early this month that the decedent Moya McKoy left a will nominating someone other than Mr. Clifton and Mr. McKoy to serve as her personal representative. This unforeseen complication has made it impossible to resolve the matter by December 28, 2018.

Accordingly, our firms respectfully request an extension until **February 28, 2019** to resolve the duplicate lawsuits brought by Mr. Earl Clifton and Mr. Noel McKoy. We submit that the extension is necessary and justified given the probate issues that need to be addressed, and that the defendants will not be prejudiced by the extension. We have conferred with counsel for the Johnson & Johnson defendants and Imerys Talc America and they do not oppose the extension.

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Respectfully,

/s/ Warren T. Burns
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CC: All Counsel of Record (via ECF)